

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own Motion
into the Appropriate Pricing, based upon Total
Element Long-Run Incremental Costs, for
Unbundled Network Elements and Combinations of
Unbundled Network Elements, and the Appropriate
Avoided Cost Discount for Verizon New England,
Inc. d/b/a Verizon Massachusetts' Resale Services
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T's EIGHTEENTH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits the following information
requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon
subsequently receives or becomes aware of additional information responsive to these
requests.

If an answer refers to Verizon's response to another information request in this proceeding,
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The page references in the following questions are to the hard copy of the Direct Testimony of

Louis D. Minion on behalf of Verizon Massachusetts on Costs and Rates For Access to OSS ("Minion Direct") and accompanying Exhibit and Workpapers distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

- ATT-VZ 18-1. The Minion Direct, at page 5, lines 6 and 7, includes the statement that, "The ongoing costs reflect the annual system maintenance of the newly developed or modified core system functionalities, interfaces, and gateway systems, as well as the annual carrying costs of the capital investment needed to provide access to Verizon MA's OSSs." Please state what percentage of the "One-Time Development Expenses" listed on Workpaper 4 were associated with modifying core system functionalities. Please also list and explain each functionality modified and the purpose for the modification.
- ATT-VZ 18-2. The DTE stated, at page 36 of its Phase 4-L Order¹ (the "4-L Order") that, "Bell Atlantic has proposed to establish rates to recover a portion of approximately \$108 million in expenditures and approximately \$18 million in ongoing costs which it states were incurred to modify and provide CLECs with access to OSS covering New York and New England." Please explain the relationship between the development costs shown in column D of Workpaper 4, page 1 and the development costs cited above in the 4-L Order.

Respectfully submitted,
AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.
By its attorneys,

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
Emily R. Donovan
Kevin R. Prendergast
Palmer & Dodge LLP
One Beacon Street
Boston, MA 02118
(617) 573-0100

June 11, 2001

¹ DTE 10/14/99 Order in -Phase 4-L 96-73/74, 96-75, 96-80/81, 96-83, 96-94.